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# Legal Response to Women Trafficking in Nigeria

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## Abstract

Nigerian women are being trafficked mostly for sexual exploitation to Italy and to other destinations including Belgium, France, Spain, Sweden the Netherlands and the former Czechoslovakia; while young girls are trafficked for domestic and agricultural labour from West, East and Central Africa to the Middle East and Europe. This paper aims at revealing the act of women trafficking in Nigeria and the ways the laws had combated it.

**Key words:** Trafficking; Women; Nigeria; Laws

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## INTRODUCTION

The largest group of prostitutes from sub Saharan Africa comes from Nigeria, and they are usually recruited through a specific type of trafficking network (<http://www.immigrationinformation.org>). Trafficking in women from Nigeria is strongly concentrated in the state of Edo in the south – central part of the country. A survey by women's health and action research center in Edo's capital, Benin city a few years ago showed that one in three young women had received offers to go to Europe (<http://www.immigrationinformation.org>.)

This paper aims at revealing the act of women trafficking in Nigerian and the ways the laws had combated it.

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## 1. WHAT IS TRAFFICKING?

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According to the United Nations Protocol, Article 3(a) of 2000, trafficking involves.

.....the recruitment, transportation, within and across borders, purchase, sale transfer, harbouring or receipt of a person, by means of threat, coercion, abduction, fraud, deception, or debt bondage for the purpose of placing or holding such a person whether for pay or not, for forced labour or services, slavery or practices similar to slavery, servitude or the removal of the organs.

*According to the International Organization on Migration (IOM, 1996, p.3),* trafficking occur when a migrant is illegally engaged (recruited, kidnapped, sold, etc. ) and/or moved, either within natural borders or across international borders by intermediaries (traffickers), who during any part of the process obtain economic and other profit by means of deception, coercion, and/or other forms of exploitation under conditions that notate the fundamental human right of migrants.

Based on I.O. M's definition of trafficking, it is estimated that of the 30 million undocumented migrants, 4 million are smuggled or sex trafficked, and the ventures generation revenues of and 5-7 billion (Graycar, 1999). The term trafficking has however been restricted to instances where people are deceived, threatened, or coerced into series of exploitation including prostitution.

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## 2. SEX TRAFFICKING IN NIGERIA

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Nigeria has been said to be the main location for persons trafficked to Europe, the middle east, west and central Africa. Nigerian women are being trafficked mostly for sexual exploitation to Italy, but also to other destinations including Belgium, France, Spain, Sweden the Netherlands and the former Czechoslovakia; while young girls are trafficked for domestic and agricultural labour from west, east and central Africa to the middle east and Europe (Elabor- Idemudia, 2006, pp.203-204)

International trafficking of women started majorly in Nigeria after the overthrow of Shehu Shagari (the erstwhile civilian president) by the military government in 1983; when the first large number of women/girls was flown off to Italy and other European destinations (Osakwe, 1985). Today, the menace has became rampant as women and girls are now been trafficked to Europe even though the full nature and scope of the trafficking remain largely unknown.

An estimate by an Italian nongovernmental organization, the vocal superior nag ion D' Italia (2001) quoted the number of Nigerian women and girls engaged in commercial sex work in Italy as 20,000, including 3,000 in Turin alone. Immigrating

and policy officials throughout Europe report a steady flow of women including Nigerians entrapped and sold into prostitution particularly in the Nether land, Italy and the Czech Republic (UN-Human Rights Report, 2000). The number was put at 45,000 by the Nigerian minister of state (Elayo, 2002). The human rights watch in its 2,000 report indicated based on reports from womens' organizations including (UNIFEM, 1999).

United Nations Commission on the Status of Women, (UN-CSW, 1996), stated that hundreds of Nigerian women 'migrated' and were trafficked to Europe in responses to job offers as domestic workers or waitresses. On arrival to their destination countries in Europe, many of them were forced into prostitution in order for the women to be able to pay off debts owed to traffickers who assisted in their migration.

The report further made known that Nigerian crime syndicates use indebtedness, threats of beatings and rape, physical injury to the victim family, arrest and deportation of those forced into sex work from attempting to escape (human rights report, 2000). Women trafficking in Nigeria has led to immense wealth, death, ill health, misery and trauma for the trafficked women and girls.

The victims of the trade in Nigeria are mostly women and girls from very poor economic backgrounds who are lured from their homes in the turns and villages with promises of immeasurable wealth and opportunities in Europe. (Idemudia, 2006, p.204)

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### **3. PRACTICAL INSTANCES OF SEX TRAFFICKING IN NIGERIA**

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Below are practical examples of trafficked women who were deported to Nigeria from Italy, Belgium and the Netherlands. They are (Cases A-E) some of trafficked women and girls experiences before, during and after trafficking which was collected by Elabor Idemudia supra, during her three months research interviews held in Nigeria. From April to July 2002 (Ibid., pp.206-208); also (pi.library.yorku.ca/ojs/index)

#### **3.1 Case A**

I was born on September 12, 1978 in Oredo local government of Benin City, Edo state and here is my story. Sometimes in 1999, Mrs. Rosaline Obazee came to our house in Benin and said she was sent by my father who was in the Ukraine to take my sister and I to the Ukraine to join him. On that day we were very excited and started preparing for the impending trip. She came back to insist several times until the day when we finally left for the trip. We left Nigeria in late 1999 and first traveled to Conakry where we met other girls. We stayed in a house where we were never allowed to go out.

One night, Mrs Obazee called me out of the room and asked me to take off my clothes because she needed to take some of my public hair. When I asked why, she explained that it was to be used as part of an oath taking process to ensure that I did not go to the police, I became very suspicious of her whole act and refused to cooperate. Eventually, force was used by Mrs Obazee and another woman to remove some hair from my head, my armpit and my public area and blood was also taken from my head. They were used for oath taking and I was told that the oath was to ensure my silence and would lead to my death if broken. After this oath taking ceremony, I was locked up in my room for several days. One day, I heard voices outside my room and when I peeped through the key hole, I saw my dad in a meeting with other people. This came as a shock to me. I started to shout daddy, daddy, what are you doing here. Are you not supposed to be in Ukraine? I ran to my sister and told her that our dad was there. My father was angry and said what I have done to this woman that she will take my money and bring my children from Nigeria. He asked to see us and when we were allowed to see him, he asked for our passports, we told him they were with Mrs. Obazee. He demanded the passport from her but she refused to hand them over to him unless we paid her US\$25,000.00 each. Subsequently, we were smuggled out by someone who knew our father and was willing to help us. That was how we were saved and we went to the Nigerian embassy in Conakry where we were rescued and deported to Nigeria.

### **3.2 Case B**

I am married to a man who is an engineer by profession and the marriage was blessed with seven children consisting of six boys and one girl. One evening as I was returning home from the market, a car drove by me and was looking when I turned; it was Mrs Obazee who told me that she has a message for me from the Ukraine. She gave me a ride to my home and told me that my brother had asked her to bring his eldest daughter and I to the Ukraine. Since my brother's wife gave birth to twins, they needed help with childcare and requested that I should come out there to help. When I showed some doubts about her story, she produced photographs of my brother as well as a video of his entire family, which we all watched. When I informed my husband about the development, he refused to go along. But Mrs. Obazee begged and convinced him otherwise. She kept coming to our house for three months and during that period made herself very likeable to the family. She convinced me that Europe was a beautiful place and since I was a trader, there will be ample opportunity for me to do business while there. The day finally arrived for our departure by which time I had US\$500.00 with which to travel. Only \$1,500 of the money was mine, the rest I borrowed from my husband. We traveled to Conakry since I did not have the correct travel documents for the trip. In Conakry, we stayed in a house and were told that we were going to travel to Europe in a few days.

After two weeks, I was getting anxious and asked Mrs Obazee when we were going to travel to Europe. She assured me that it was not going to be long. She asked me to give her my money to keep as armed robbery was rampant in Conakry. I trusted her and gave her the money for safekeeping. After collecting the money from me, her attitude towards me changed. One night, she called me and told me that she wanted to collect some body items from me. They included hair from my head, armpit and pubic area and, my fingernails. I told her that I wouldn't do that and she threatened my life. She brought some men to force me to give them those body items which she said would be used for oath taking to prevent me from going to the police.

After the oath taking ritual, she informed me that I was not going to the Ukraine to see my brother but was, instead, going to Italy to make money. I said that I was not going to Italy but to the Ukraine and she reminded me that if I did not cooperate, to oath I had taken it will result in my death or she would arrange for my death since I was at her mercy with no funds. The only condition under which I was going to be free was to work as prostitute and pay her US\$50,000.00 as cost of bringing me to Conakry. I was locked up with some other women in a room after that.

One day, we heard commotion in the house and wondered what was happening, when we were allowed out of our room, I saw my brother and told him all that had happened. He was very mad and asked for my passport which I said was in Mrs Obazee's possession. Upon demand, he said that she would only release the passport upon payment of US\$250,000. Argument and exchange of words ensued, finally a man called big John came to our rescue and drove us to a place where my brother placed a phone call to the Nigerian consulate in Conakry. We were rescued and returned to Nigeria. Upon arrival in Nigeria, my brother went to Mrs Obazee's family to complain about her behaviour. Rather than call their daughter to order, thugs were arranged to send my family home on fire. My father was so traumatized by the incidence that he suffered a heart attack and died soon after. I am still living in fear of what they might do to my children and I.

### **3.3 Case C**

I left for Italy in October 2000. I had my valid passport and a three month visa. I was sponsored by somebody whose name I cannot reveal. I completed my secondary education in 1990 but did not pass the West African School Certificate Examination. I tried between 1990 and 2000 to be taking the examinations six times but still did not pass. I then heard that there were lots of jobs in Italy that did not require much education. I got this person to sponsor my travel and he arranged all my traveling documents.

I traveled through the Murtala Muhammed International Airport. Once I got to Italy, my passport was withdrawn from me and taken back to Nigeria to be used in sponsoring another woman who wanted to travel for the same purpose. In Italy, I

was bought by a madam who immediately paid the trafficker who brought me from Nigeria. I was put in a house where I paid the rent, fed and clothed myself. I had to start prostituting immediately so that I could repay my madam her money which was put at 90 million lire (US\$50,000.00)

If you are lucky, you may meet a white man who will give you the money to repay your debt at once. If you are unlucky, it may take three to four years to pay back if you are able to service ten customers a day. I knew that I was going to Italy for prostitution but I prayed that upon getting there, that God should change my situation. I only got into this situation because of some circumstances, I was very unhappy because I am a Christian but I am relieved now that I was deported back home.

I cannot mention the name of my trafficker or the name of the women who bought me because I had been made to swear an oath of secrecy. They took hair from my armpit, eyelashes and from my private organs for rituals both here in Nigeria and in Italy. The effect of this is that if I reveal the names of my trafficker and procurer, I will die or go mad. Now, I want to go back to school in Nigeria after which I hope to get a decent job, get married and live a decent life.

### **3.4 Case D**

I usually travel to coutonuo to buy jewelry and other items for sale in Nigeria. It was during one of these trips that I met with other people traveling by road and made friends with one of them who knew the route by road to Spain. I arranged to travel with her and we traveled from coutonuo to Abidjan, from Abidjan to Mali through other desert countries to Morocco. I went from Morocco to Spain in 1998 where I spent two years. I left Spain for Italy in 2000. Once there, I was a total stranger and stayed in the train station for 10 days because I didn't know anyone. On the third day, I met a Nigerian woman who was from Edo state, Nigeria and I explained my situation to her. She decided to take me in and help me. Since my presence was illegal, I could not find a decent job and so started to process my document. It was while doing so that I met with other Nigerian woman who took me to their madam who decided to introduce me into prostitution. In exchange for room and board, I had to work as a prostitute. I do not consider myself to be a prostitute but had to engage in temporary sex work to raise funds to process my papers. I was guilty of not having the legal papers to be in Italy. Now that we have been returned to Nigeria, the Nigerian government is not ready to help us and while we are trying to help ourselves, they still went ahead to disturb us.

### **3.5 Case E**

For subject E, a trip to Italy was all it took to be successful. All along, the 25 years old woman from Benin city has been fascinated by tales told by some of her elder sisters and cousins who had gone to work in Italy. She had seen how, after staying

in Italy for minimum of three years, why the women came back to Nigeria fully loaded. They brought cars and built large houses. This trend constituted a temptation for her to try her luck by joining her comrades. She decided to join others so as to prove to her detractors that she could be successful as well and the knowledge that things could get-tough did not stop her resolve to go to Italy. Her journey took her from Nigerian through bush paths to the republic of Benin through Togo, Ghana, Burkina Faso, Mali Algeria and so morocco by foot. She was in a cohort consisting of three girls and three boys and their trek took them through the desert where they came across remains of those who had gone before them and could not complete the journey and succumbed to the harsh desert terrain. From morocco, the girls had to cross to Spain in a tube like boat which unfortunately, capsized killing all three boys and one girl. Only two girls including subject E survived the accident. After a few days in Spain, the girls proceeded to Italy where her sojourn in prostitution began. It took her almost a year to complete the journey to Italy but it took her only three weeks to get caught and deported to Nigeria. She was arrested by the Italian police and deported along with 88 other for isolation of Italian immigration laws and engaging in prostitution. She claims however that she was not a prostitute but a hairdresser who was deported because she did not have the current papers to remain in Italy.

### **3.6 Case F**

A woman has been found guilty of people trafficking after forcing two Nigerian women into prostitution by making them eat snakes in an African black magic ceremony. Lizzy Idahosa and husband Jackson Omoruyi made £70,000 from victims (<http://www.dailymail.co.uk/news/article>, BBC News October 14, 2014).

The women were terrified with voodoo and made to take part in 'juju' ritual. The women were made to believe they were travelling to Britain for a better life, but were forced to work as prostitutes in massage parlours around UK. The African black magic was used to scare women into complying and threatened they would face 'illness, madness, infertility or death' if they didn't. Pregnant Idahosa, 24 years old, was found guilty of eight counts including trafficking, inciting women to be prostitutes and transferring criminal property and Omoruyi, 41 years old, was guilty of two counts of money laundering. (<http://www.dailymail.co.uk/news/article>, BBC News October 14, 2014)

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## **4. SUMMARY OF THE STUDY'S FINDING**

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Based on the narratives of six of the victims of sex trafficking considered, the process of trafficking was seen to involve the following stages.

- (a) Recruitment: Consists of both voluntary (based on choice) and involuntary (based in force on coercion) methods used by traffickers.



- (b) Contract signing and oath taking: The recruited women are made to sign an agreement to pay back huge sums of money as return on investment to their sponsors. They are also usually made to swear secrecy and fetish oaths.
- (c) Procurement of travel documents: The recruited girls/women are usually given travel documents, which are forged such documents are usually taken from the victims.
- (d) Transportation - Modes of traveling include, traveling on land or foot, or in buses through border cities (including Idiroko) by sea (e.g. through Lagos and by air (through Murtala Mohammed airport, Lagos and Mallam Aminu kano Airport kano).
- (e) Routes - usually include: some – Guinea, – Morocco – Spain – the rest of Europe, or –Niger – Libya – Malta – Europe. Other route include: Nigeria through the Republic of Benin, Togo, and Ghana to Ivory Coast where they obtain travel document and travel to Europe through Morocco. They also travel by road to Cameroon they assume that matriarchy and travel to Europe. Other routes include traveling by road through the Sahara desert, Niger, Libya and across the Sahara through Algeria, Morocco, Spain and Portugal.
- (f) Experience in destination: On arrived at destinations countries, victims are sold to “Madams” in those countries for between US\$ 150,000-20,000). They are morally lodged in brothel by the madams where reports reveal that they are forced into prostitution and made to service about 10 men. They keep doing this until they can repay the agreed debt, which is usually between us \$45,000 to us \$ 60,000.

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## **5. THE RIGHT OF TRAFFICKED PRESENTLY UNDER NIGERIAN LAW**

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Under Nigerian constitution (1999), women are protected and conferred with some rights. For instance, section 39 of the Constitution, states that women are protected against any discrimination on the basis of their sex, particularly with regard to right to life, health, liberty, security of person, personal integrity and freedom from torture and slavery. Articles 2 and 3 of the African Charter on Human and Peoples Right, ratification and Enforcement Act (1983), and Article 20 of the International Convention on the Elimination of all Forms of Discrimination against women reinforces the same right. Both Acts are International treaties ratified by Nigeria, by virtue of which their provisions are binding on the Nigerian Government and they include an undertaking to extend to women the protection they contain.

Also, section 225 of the Nigerian, Constitution, state that the abduction of a girl under 18 with the intent of having carnal knowledge with her in a misdemeanor



offence, which carries, upon conviction, two years imprisonment. Section 22 of the same Constitution states that “any person male or female who trades solely in prostitution or lives in part on the earnings from prostitution, is guilty of an offence punishable by imprisonment for two years.

Section 227 of the Nigerian Constitution states that the unlawful detention of a woman or girl against her will or wish with the intent of defilement is an offence which will attract three years jail term. Even though these laws exist, it has been observed that the penalties attached are very mild e.g. 2 to 3 years jail terms. It has been echoed by many that such penalties should be stiffer in view of the prevalence of act of trafficking in Nigeria.

The various laws mentioned earlier tackled trafficking but were not too specific on it too. This leads us to the specific law in the area of women trafficking which has taken Nigerian legislators several years to pass, but which has now been passed and seems to meet the various aspirations of people in that regard. The new law comes with penalties for offenders. Nigeria now has its own domestic law that criminalizes and punishes trafficking.

Prior to 2003, there was no anti - trafficking in persons legislation in Nigeria. The then wife of the vice president, Federal Republic of Nigeria, Mrs. Titi Abubakar, was responsible for setting up a committee which included persons drawn from relevant bodies to draft an anti – trafficking bill ([www.naptip.gov.ng/legal](http://www.naptip.gov.ng/legal)).

The bill was the first private bill presented to and passed into law by the National Assembly. The then President of the Federal Republic of Nigeria, Chief Olusegun Obasanjo assented to it on 14<sup>th</sup> July 2003 (Ibid.). The Bill gave birth to Trafficking in Persons (Prohibition) Law Enforcement and Administration Act, 2003 (Ibid.). Section 1 (1) of the Act established a multi dimensional crime fighting Agency known as the National Agency for Prohibition of Traffic in Persons and Other Related Matters (NAPTIP) (Ibid.). The law was subsequently amended by Trafficking in Persons (Prohibition) Law Enforcement and Administration (Amendment) Act, 2005 to give practical translation to some of the enforcement powers of the Agency (Ibid.).

The Nigerian National Assembly has also re-enacted the trafficking in persons (Prohibition) Law Enforcement and Administration Act of 2003 (TIPPLEA) which now empowers NAPTIP to focus strictly on human trafficking related matters and enables it to carry out its mandate maximally and increase penalty for offenders. (<http://www.naptip.gov.ng/>) The re-enactment of the TIPPLEA is in furtherance of a request presented to the National Assembly by the Agency urging it to look into the TIPPLEA Act of 2003 as amended with its various lapses and impediments (Ibid.). These lapses have over the years truncated the legal and overall efforts of NAPTIP in adequately convicting offenders of human trafficking. For example several provisions in the existing law are not consistent with the requirements of the Trafficking in Persons Protocol, Supplementing the United Nations Convention

against Transnational Organised Crime, (Palermo Convention), 2000. Also the 2003 Act excluded punishment of offenders for conspiracy and did not prescribe adequate and stiff penalty for offenders in trafficking generally.

The passage of this Act encompasses well drafted laws which capture languages and terms of the trafficking protocol, as well as criminalizes all the elements contained in the definition of trafficking in person's protocol (Ibid.). This re-enacted Act will also correct various mistakes in the wordings, sentences, contradictory provisions, and the duplication of the penal sections contained within the TIPPLEA Act of 2003 (Ibid.). The United States 2014 Trafficking in Persons Report on Nigeria applauded the efforts of the country and NAPTIP for demonstrating significant commitment in the fight against human trafficking but admonished the government of Nigeria for not passing the "draft legislation that would restrict the ability of judges to offer fine in lieu of prison time during sentencing" (Ibid.).

The new bill stipulates stiffer penalties for offenders than the existing law. It seeks to stop human trafficking in Nigeria and prescribes a minimum of seven years imprisonment or a minimum fine of N1 million for offenders. (Premium Times, Tuesday December 9<sup>th</sup>, 2014). It prescribes criminal punishment for any person found to have illegal custody of a child under the age of 18, sexually abuse, or causes any person to be exploited. The passage of the bill followed a clause by clause consideration of the report of the Senate Joint Committee on Judiciary, Human Rights and Legal Matters; and Women Affairs and Youth Development (Ibid.).

The repealed version of the bill had prescribed five years jail term or a fine of not less than N1 million (Ibid.). The Senate also amended the bill by reducing the jail term for forced labour from seven years to five years and fine option of N2 million to N1 million (Ibid.). "Any person who permits any place or premises to be used for the purpose of forced labour commits an offence and is liable on conviction to imprisonment for a term of not less than five years and to a fine of not less than N1million," the new bill states (Ibid.). The Senate Joint committees said the recommendation for a reduction was necessary as "to make it consistent with punishments for similar offences under the bill." (Ibid.) The Act will put to rest such uncertainties and lapses as presented by the United State trafficking reporting on Nigeria. Other areas of the amendments will also incorporate into the Act will be the inclusion of issues relating to removal of organs as provided for in the trafficking protocol (<http://www.naptip.gov.ng/>).

However, the re-enacted Act will not capture some penal and criminal codes such as rape, defilement and smuggling of migrants which are already under the purview of the Nigeria Police Force and Nigeria Immigration Services respectively (Ibid.). The re-enacted Act also rules against double jeopardy as in sections 25 (Ibid.). While the emphasis on age limit of victims will be as much as possibly be de-emphasized in order to give less room to traffickers who usually capitalize on such limitations of the Act to escape prosecution (Ibid.).

Other inclusions on the re-enacted Act is the punishment of offenders for conspiracy which was earlier excluded from the TIPPLEA of 2003 and also, all the penal sections will be grouped together for easier comprehension and reading (Ibid.). The amended bill also prohibits the employment or procurement of children under the age of 12 as domestic servants (Ibid.). It further protects children generally from being used for exploitative, injurious or hazardous work. "Any person who employs, requires, recruits, transports, harbours, receives or hires out, a child under the age of 12 as a domestic worker, commits an offence." "If convicted, such an offender is liable to imprisonment for a minimum term of six months and not exceeding seven years," it states (Ibid.).

The bill was approved during one of the Federal Executive Council (FEC) meetings in January 2013, following a presentation of a memorandum by the Attorney-General of the Federation and Minister of Justice, Mr Mohammed Bello Adoke (SAN). The memorandum sought approval for the bill entitled 'Trafficking in Persons (Prohibition), Enforcement and Administration Bill, 2012.' (www.thisdaylive.com, February 16, 2013). The principal objective of the current bill is to repeal and cure the defects in the existing law and reposition the National Agency for the Prohibition of Trafficking in Persons for effective delivery on its mandate and provide for a more comprehensive legal and institutional framework for the prohibition, prevention, detection, prosecution and punishment of human trafficking offences in Nigeria." (The Nigerian Voice, General News, 16<sup>th</sup> January, 2013)

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## CONCLUSION AND RECOMMENDATIONS

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Aiding and abetting of trafficking by Police officers should be looked into. Nigerian law enforcement agents have been accused of aiding and abetting trafficking. Some of the victims of trafficking have alleged that immigration officials actively connive with crime syndicates in their trafficking; however, there have been numbers of arrests of immigration officials and law enforcement agents for trafficking offences. Although the government of Nigeria and the police are being said to have investigated the collusion of custom officials in trafficking (HRW, 2000) their efforts have yielded minimal results. It is suggested that the government should beef up security in this regard and apply appropriate measures. Some of these measures include, mass dismissal of involved law enforcement agents irrespective of their cadre, trail of such law enforcement agents and making them to face necessary penalties e.g. serving long jail terms. Such measures will serve as deterrent to other intending officers.

Since women are more vulnerable to trafficking, a social security policy should be put in place to enhance their access to education by providing scholarships. This will make the millennium development goals of ensuring the girl-rights and child

education acts sustainable. The aim of this policy should be to eradicate the low status of women particularly the economic disadvantages they face and such efforts must be incorporated into a larger anti-poverty and anti-corruption framework.

Due to the transnational character of human trafficking, countries of origin, transit and destination must work in partnership to prevent it, protect its victims and bring before the law those responsible. Government also needs to strengthen bilateral agreements to enhance and sustain international co-operation and also enter into new ones towards tackling the problems of human trafficking. This will include the co-ordination of laws, investigation and the seizure of crime proceeds. The aim of this policy should be to eradicate the low status of women particularly the economic disadvantages they face and such efforts must be incorporated into a larger anti-poverty and anti-corruption framework.

There is a great need for Nigeria to redeem her image in the international community by paying greater attention to trafficking. Compliance with and effective implementation of existing laws and ratified international treaties will go a long way in helping the nation to redeem her image. The recommendations contained in this paper will also make all these easy to accomplish.

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